

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

Civil Action No. 2:13-cv-193 (NGR)  
(Consolidated Action)

RICK PERRY, *et al.*,

Defendants.

**DECLARATION OF JOSE GARZA IN SUPPORT OF REQUEST  
FOR ATTORNEY'S FEES**

**Background and Prevailing Party**

1. I am lead-counsel for Plaintiffs, Taylor, et al., in the above-styled matter. My resume is attached hereto as Attachment No. 1. I am presenting this declaration in support of Taylor Plaintiffs Motion for Attorney's Fees and Costs. Plaintiffs are prevailing parties in this action and are entitled to attorney's fees and costs as authorized by the Voting Rights Act, 42 U.S.C. §1973l(e) as amended 2006. Specifically, Plaintiffs and their attorneys, including Jose Garza, presented pleadings, evidence, witnesses and argument to this and other Courts, challenging the 2011 voter photo ID provisions (commonly referred to as S.B. 14) enacted by the State of Texas pursuant to the Voting Rights Act. Ultimately the challenged enactment was enjoined and not implemented and a remedy imposed because of violations of Section 2 of the Voting Rights Act, found by this Court and affirmed by the *en banc* Fifth Circuit.

A review of Plaintiffs' pleadings, attachments and argument on this cause together with this Court's orders, including orders regarding the interim relief as well as final judgment demonstrate Plaintiffs' position as prevailing party in this action.

**Time**

2 My time in this case is kept contemporaneously with the work performed and usually recorded on a daily basis. During the course of this litigation and for the time period ending January 31, 2019, I devoted a total of 789.9 hours to assist with the preparation and prosecution of this action, including participating in the trial of this action. In the exercise of billing judgment, I am discounting or not billing for portions of my time to account, as noted in the time keeping exhibit attached hereto. Such discount is meant to account for any potential duplication of time with my co-counsel and to account for possible development of unrelated or unnecessary legal or factual issues. Therefore, I am requesting compensation for a total of 472.9 hours spent on the case. I have attached the time records that I maintained in this action, as Attachment No. 2.

3. There was no unnecessary duplication of efforts. My co-counsel on this case and I carefully coordinated our efforts so as to avoid unnecessary duplication. We carefully divided tasks and witness and exhibit development in a similar fashion and any overlap was minimal and necessary to avoid errors. Moreover, we consulted with each other in order to better coordinate the development of the case. The amount of time expended in this case was necessary because it presented several difficult questions of fact and law, as well as unsettled issues. Time spent in the days leading to the filing of this action were also necessary to protect TRLA's clients' interests and to properly prepare for what was expected to be a quick progression to trial. Yet, the bulk of Plaintiff's counsel's time in this cause was in the presentation of this case in this Court.

The time spent on this case represents the minimum hours necessary for an adequate preparation of pleadings, exhibits, and presentation to the court. Because of my forty-one years of experience in Voting Rights cases, I did not spend any unnecessary time on issues and evidence developed in this case, and I did not spend time on matters that were not relevant to the prosecution of this action. Although, some of the time I spent on this issue was for participating in the court case in Washington D.C., dealing with the Section 5 proceedings on the challenged legislation, such time is not billed in this case. However, some of the trial and discovery records produced in the D. C litigation was reviewed in preparation for the presentation of evidence here. The Section 5 preclearance process was relevant to the preparation of this case for obvious reasons. Similar factual

records and arguments were part of the D. C. proceedings.

**Market Rate**

4. I have been a member of the Texas Bar for over 40 years. I am also a member of numerous federal court bars across the country. Throughout my career, my practice has focused on federal voting rights litigation. I have attached my resume as Attachment No. 1 to this declaration. In addition, the State of Texas stipulated that in 2001 the prevailing market rate for my time on voting rights cases was \$325.00 per hour. Eleven years later, in 2012 fees expert Mr. Rick Gray testified and in recent fees awards, the Courts have determined that my prevailing market rate was \$425.00 per hour, in less complicated and more limited Section 5 enforcement actions. *See Vasquez-Lopez v. Medina County, Texas* 11-cv-945, W.D. Tex., San Antonio Division, 2012; *Petteway et al., v. Galveston County*, 11-cv-511, S.D. Tex., Galveston Division, 2012. For this case, Plaintiffs ask that the Court adopt the USAO attorney's fees matrix, for 2015-2019 in light of recent fee awards in the Southern District of Texas, which are similar to the matrix index. Based on this matrix I am asking to be compensated at a rate of \$613.00 per hour.<sup>1</sup> Based on my knowledge of the prevailing market rates, and my experience with court awards in voting rights cases, I believe that my current rate for a case such as this case is \$613.00. This rate is supported by the expert opinion of Mr. Bill Edwards in his declaration filed with this motion. Therefore, Plaintiff requests a rate of \$613.00 per hour for Mr. Garza's time in this action.

5. In addition, I have known TRLA Executive Director, Robert Doggett for over 20 years. I have had the opportunity to litigate this case with Mr. Doggett, as my co-counsel, making me familiar with the high quality of his work. I am also familiar with Mr. Doggett's reputation in the legal community and know that he is both a skilled and a respected member of the bar. In addition, I have known TRLA attorney Marinda van Dalen for over ten years and through this and

other litigation I witnessed the skills and quality of work of Ms. van Dalen and can attest to the skill and high quality of her work. Ms. van Dalen was TRLA's primary contact with our clients including our organizational client, La Union del Pueblo Entero, (LUPE).

**Lodestar**

6. In determining the Lodestar a court should usually consider the actual hours devoted to the case and the market hourly rate for the lawyer in question. I have devoted over 789.9 hours to the successful prosecution of this cause and am requesting compensation for 472.9 of those hours, after a discount of 317 hours in an exercise of billing judgment. In addition, our expert, Mr. Bill Edwards and Jose Garza have both testified that a prevailing market rate commensurate with the matrix of the USAO of \$613.00 per hour, for someone of Mr. Jose Garza's experience, in this case is reasonable. Therefore, the lodestar requested in this case for Jose Garza is \$289,887.70 (472.9 hrs. x \$613.00 = \$289,887.70)

7. *Preclusion of Other Employment.* My work in this litigation restricted the time available for pursuit of other litigation during the period of activity in this case. Because of the extensive work required in a time-compressed period of time, I was unable to accept and work on other cases.

8. *Time Limitation Imposed by Circumstances.* The time limitations in this case were imposed by pending election schedules and by the failure of the State Defendants to comply with the provisions of the Voting Rights Act in a timely manner.

9. *Undesirability of the Case.* This case was filed pursuant to the Voting Rights Act, 42 U.S.C. §1973c. Counsel for Plaintiff represents the individual poverty level plaintiffs and the organizational Plaintiff LUPE. This case is very undesirable because the expedited election schedule and multiple forums placed unusual time constraints on the development and preparation of the case and because of the specialized nature of the actions. Moreover, the case required

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significant time and resources to properly prosecute, and recovery of a fee and expenses was contingent on success. Finally, even though success is now insured, recovering a reasonable fee is still remote in time. Working on a case of a contingent nature for over two years, without a reasonable fee thus also makes this case undesirable.

10. *Experience and Expertise.* My experience has included participation in federal litigation, extensive advocacy in state and federal administrative hearings, and preparation of pleadings, briefs and evidence for cases in both state and federal courts. I am or have been counsel in numerous voting rights cases including the following challenges under the Fourteenth Amendment and the Voting Rights Act: *Alonzo v. Jones*, C-81-277 (S.D. Tex. 1981)[Lead counsel in a successful action challenging the at-large election system for the City of Corpus Christi, Texas under the newly amended Voting Rights Act.]; *Comm. Court of Medina County v. United States*, 719 F. 2<sup>nd</sup> 1179 (D.C. 1983)[Lead counsel representing minority defendant-intervenors opposing Medina County's gerrymander redistricting plan in a preclearance action under Section 5 of the Voting Rights Act. Successfully overturned District Court's failure to award attorneys' fees.]; *Lockhart v. United States*, 102 S. Ct. 988 (1983)[Lead counsel representing minority defendant-intervenors opposing City of Lockhart's preclearance proceedings before the United States District Court for the District of Columbia and arguing counsel before the United States Supreme Court.]; *Terrazas v. Clements*, 537 F. Supp. 514 (N.D. Tex. 1982)[Co-counsel in successful challenge to States redistricting plans for Bexar and El Paso Counties.]; *Gomez v. City of Watsonville*, 863 F. 2<sup>nd</sup> 1407 (9<sup>th</sup> Cir. 1988)[Co-counsel in successful challenge to the at-large election system for the City of Watsonville, California.]; *Overton and Calderon v. City of Austin*, 871 F. 2<sup>nd</sup> 529 (5<sup>th</sup> Cir. 1989)[Lead counsel for Mexican American plaintiffs in challenge to at-large election system for the City of Austin.]; *Sanchez v. Bond*, 875 F. 2<sup>nd</sup> 1488 (10<sup>th</sup> Cir. 1989)[Lead counsel in challenge to the election structure for Saguache County, Colorado Commissioners.]; *Mena v. Richards*, C- 454-91-F (332<sup>nd</sup> Judicial District, Hidalgo County, Texas, 1992)[Co-counsel in successful challenge to the 1991 redistricting plans for the Texas House of

Representatives and Texas Senate.]; *LULAC v. NEISD*, 903 F. Supp. 1071 (W. D. Tex. 1995)[Co-counsel in successful challenge to election system for Trustees of the North East I.S.D.]; *LULAC v. State of Texas*, 113 F. 3<sup>rd</sup> 53 (5<sup>th</sup> Cir. 1998)[Lead counsel in successful challenge of a State election change under Section 5 of the Voting Rights Act.]; *Perez v. Pasadena I.S.D.*, 165 F. 3<sup>rd</sup> 368 (5<sup>th</sup> Cir. 1999)[Co- counsel in challenge to the at-large election system for Trustees of the Pasadena I.S.D.]; *Valdespino v. Alamo Heights I.S.D.*, 168 F. 3<sup>rd</sup> 848 (5<sup>th</sup> Cir. 1999)[Lead counsel in challenge to at-large election system for Trustees of the Alamo Heights I.S.D.] and of course in this case, including argument before the United States Supreme Court in (*Perry v. Perez*, 132 S.Ct. 934 (2012) [Lead counsel for appellee]) and numerous others. Also, in an article published by Texas Lawyer, a respected professional legal trade magazine, I was named one of twenty-five extra- ordinary minority lawyers in Texas in 2009. Finally, I was named Appellate Lawyer of the week by the National Law Review after my oral argument before the United States Supreme Court in *Perry v. Perez*.

11. I have provided advice and direction to other private attorneys in at-large election challenges, Section 5 enforcement actions, and gerrymandering election challenges, as well as to various legal agencies in Texas. I have also testified before a Congressional subcommittee on the renewal of the Voting Rights Act. I have also been an adjunct professor at the University of Texas, School of Law and at St. Mary's University, School of Law where I taught a seminar course on Voting Rights.

12. It is my opinion, based on my experience, on awards made for my services in similar cases several years ago and upon inquiring of other lawyers, that the prevailing market rate for an attorney of over forty years of experience, trying a case in his/her area of specialization, in a difficult and complicated civil rights case is between \$600 and \$700 per hour.

13. *Results Obtained and other Enhancement Factors.* The results obtained in this case were precisely what the Plaintiffs requested as an appropriate remedy, injunctive relief, remedies to violations of Section 2 and Section 5 of the Voting Rights Act.

**Costs**

The TRLA advanced all of the costs and expenses made to properly and effectively prosecute this action. The Taylor Plaintiffs therefore request an award for all costs devoted to this case. These costs include filing fees, service costs, travel associated with communicating and preparing our clients as the litigation commence and progressed, travel associated with the preparation for and presentation of trial, discovery expenses and expert witnesses. These were necessary to the proper presentation of our clients' claims in this case. These expanses totaled: **\$44,273.62** and are evidenced in Exhibits 4 and 5 to Taylor Plaintiffs Motion for Attorneys' Fees. Exhibits 4 and 5 were created by me from a review of receipts and invoices kept in the ordinary course of business by TRLA.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/ Jose Garza  
Jose Garza

## ATTACHEMT NO. 1

### RÉSUMÉ

**Jose Garza** has more than forty (40) years of experience practicing law, dealing almost exclusively with federal law. His practice areas focus mainly on governmental entities and federal litigation including 1<sup>st</sup> and 14<sup>th</sup> Amendment issues; redistricting, federal voting rights, and civil rights and state law election challenges. Mr. Garza is currently the Litigation Director for Texas RioGrande Legal Aid, Inc. (part time) as well with the Law Office of Jose Garza.

Mr. Garza has represented Latino voters in voting rights litigation including state-wide redistricting cases. Mr. Garza has testified as LULAC Voting Rights Counsel before the Congress on the re-enactment of Section 5 of the Voting Rights Act and has Represented LULAC in various voting rights matters including as co-counsel in *LULAC v. Perry*, where the U.S. Supreme Court found the Texas Congressional districting plan illegal under the VRA, because it discriminated against Latino voters. Formerly, he was involved in voting rights litigation as Program Director for the Mexican American Legal Defense and Education Fund (MALDEF). Mr. Garza has taught voting rights seminars as an adjunct professor at the University of Texas at Austin, School of Law and St. Mary's University, School of Law. In addition, he currently represents the Mexican American Legislative Caucus (MALC) in the 2011 state redistricting litigation and on other voting rights issues and matters.

Education: B.S. in Education, Texas A&I (1971-1973); Masters of Education, University of Texas at San Antonio (1973-1975); J.D., St. Mary's University (1975-1978).

Relevant Experience: *Law Office of Jose Garza* (1997-1998; March 2001-present); *Texas Rural Legal Aid, Inc.* (1978-1979; 1990- present (part-time)); *Gray & Becker* (1994-1996); *Mexican American Legal Defense & Education Fund* (1979-1990); *Texas Attorney General* (1986);

Adjunct Teaching Positions: *University of Texas, School of Law* (1988-1994) and *St. Mary's University, School of Law* (1990-1995)

Significant Cases:

***Aguero v. Christopher***, 481 F. Supp. 1272 (S.D. Tex. 1980) - Lead counsel in successful farmworker action brought to enforce provisions of Wagner-Peyser Act and Fair Labor Standards Act.

***Alonzo v. Jones***, C-81-277 (S.D. Tex. 1981) - Lead counsel in a successful action challenging the at-large election system for the City of Corpus Christi, Texas under the newly amended Voting Rights Act.

***Comm. Court of Medina County v. United States***, 719 F. 2<sup>nd</sup> 1179 (D.C. 1983) - Lead counsel representing minority defendant-intervenors opposing Medina County=

gerrymandered redistricting plan in a preclearance action under Section 5 of the Voting Rights Act. Successfully overturned District Court's failure to award attorneys fees.

**Lockhart v. United States**, 102 S. Ct. 988 (1983) - Lead counsel representing minority defendant-intervenors opposing City of Lockhart's preclearance proceedings before the United States District Court for the District of Columbia and before the United States Supreme Court (arguing counsel).

**Terrazas v. Clements**, 537 F. Supp. 514 (N.D. Tex. 1982) - Co-counsel in successful challenge to States redistricting plans for Bexar and El Paso Counties.

**Gomez v. City of Watsonville**, 863 F. 2<sup>nd</sup> 1407 (9<sup>th</sup> Cir. 1988) - Co-counsel in successful challenge to the at-large election system for the City of Watsonville, California.

**Overton and Calderon v. City of Austin**, 871 F. 2<sup>nd</sup> 529 (5<sup>th</sup> Cir. 1989) - Lead counsel for Mexican American plaintiffs in challenge to at-large election system for the City of Austin.

**Sanchez v. Bond**, 875 F. 2<sup>nd</sup> 1488 (10<sup>th</sup> Cir. 1989) - Lead counsel in challenge to the election structure for Saguache County, Colorado Commissioners.

**Mena v. Richards**, C-454-91-F (332<sup>nd</sup> Judicial District, Hidalgo County, Texas, 1992) - Co-counsel in successful challenge to the 1991 redistricting plans for the Texas House of Representatives and Texas Senate.

**LULAC v. NEISD**, 903 F. Supp. 1071 (W. D. Tex. 1995) - Co-counsel in successful challenge to at large election system for Trustees of the North East I.S.D.

**LULAC v. State of Texas**, 113 F. 3<sup>rd</sup> 53 (5<sup>th</sup> Cir. 1998) - Lead counsel in successful challenge of a State election change under Section 5 of the Voting Rights Act.

**Perez v. Pasadena I.S.D.**, 165 F. 3<sup>rd</sup> 368 (5<sup>th</sup> Cir. 1999) - Co-counsel in challenge to the at-large election system for Trustees of the Pasadena I.S.D.

**Valdespino v. Alamo Heights I.S.D.**, 168 F. 3<sup>rd</sup> 848 (5<sup>th</sup> Cir. 1999) - Lead counsel in challenge to at-large election system for Trustees of the Alamo Heights I.S.D.

**Gomez v. City of Eagle Pass**, 91 F. Supp. 1000 (W. D. Tex. 2000) - Co-counsel in successful action against the City of Eagle Pass for illegal termination of City Manager in violation of Title VII's protection from gender discrimination, and 14<sup>th</sup> Amendment's protections from political patronage discrimination.

**Balderas v. State of Texas**, (E.D. Tex. 2001) - Co-counsel representing the Mexican American Legislative Caucus, in successful challenge to 2001 Texas redistricting plan for the Texas House of Representatives.

**LULAC v. Perry**, 126 S. Ct. 2594 (2006) - Co-Counsel representing the League of United Latin American Citizens (LULAC) in successful challenge to the 2003 Texas Congressional redistricting plan.

**Perry v. Perez**, 132 S.Ct. 934 (2012) - Lead counsel for the Mexican American Legislative Caucus in 2011 Texas redistricting litigation. Arguing counsel.

**Vasquez-Lopez v. Medina County, Texas** 11-cv-945, W.D. Tex., San Antonio Division, 2012 - Lead counsel in successful Section 5 enforcement action.

**ATTACHMENT NO. 2**  
Voter ID litigation  
**TIME RECORDS FOR JOSE GARZA**

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**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

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**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

H O U R S

[CASE ID VID07: Voter Identification]

VID07 85B-IND-Electio	[CR] Case Review confer with J.Valdez-Cox. Confer with MvD.	08/22/2013 10:00 - 11:00	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[TV] Travel travel to san antonio. confer with DOJ lawyer about new filing on voter ID law.	08/22/2013 11:01 - 15:19	[40115] Jose Garza	4.3
VID07 85B-IND-Electio	[DOC] Document - receive/review reviewed DOJ complaint, reviewed GK data on locations of DPS stations.	08/23/2013 11:11 - 11:47	[40115] Jose Garza	0.6
VID07 85B-IND-Electio	[C] Conference w/ confer with Marinda on status of investigation.	08/26/2013 10:04 - 10:16	[40115] Jose Garza	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review review and modify client letter.	08/26/2013 10:17 - 10:29	[40115] Jose Garza	0.2
VID07 85B-IND-Electio	[CR] Case Review review file. confer with MvD and RD on efforts to educate client community about status of law.	08/30/2013 14:20 - 14:50	[40115] Jose Garza	0.5
VID07 85B-IND-Electio	[CR] Case Review investigation. interviewed Edinburg political figure on status of special city election and use of voter id law. conferred with counsel for Hidalgo County. called Javier in Eagle Pass to see what status of election there.	09/13/2013 15:01 - 16:37	[40115] Jose Garza	1.6
VID07 85B-IND-Electio	[C] Conference w/ national groups interested in intervening in pending litigation. confer with Javier on issues related to voter id and recent eagle pass election. call potential victim in D'hanis. review recently filed pleadings.	09/17/2013 10:30 - 12:48	[40115] Jose Garza	2.3
VID07 85B-IND-Electio	[CR] Case Review review file. confer with Marinda and DH. confer with Gerry Hebert on status of existing cases.	09/19/2013 14:39 - 15:15	[40115] Jose Garza	0.6
VID07 85B-IND-Electio	[DOC] Document - receive/review reviewed draft press advisory on work of local comm. organization on voter id educational campaign. confer with Marinda on same and potential victims. confer with RRios on potential victims in Hidalgo county and possible meeting on thursday.	09/20/2013 11:36 - 12:00	[40115] Jose Garza	0.4
VID07 85B-IND-Electio	[CR] Case Review review emails on file. respond to emails. confer with counsel on case.	09/20/2013 12:01 - 13:01	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[C] Conference w/ DH and MvD. discuss status and additional assignments.	09/20/2013 13:02 - 14:02	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[INV] Investigation travel to Hidalgo County. meet with local community leaders and potential victims of vid law. interview and place open records request with City Sec. of Edinburg. travel back to San Antonio.	09/26/2013 08:03 - 18:03	[40115] Jose Garza	10.0
VID07 85B-IND-Electio	[CR] Case Review confer with Marinda on recent interviews, developments in the case.	09/27/2013 16:02 - 16:20	[40115] Jose Garza	0.3
VID07 85B-IND-Electio	[INV] Investigation confer with plaintiffs in existing case on scheduling issues.	10/01/2013 11:37 - 12:07	[40115] Jose Garza	0.5
VID07 85B-IND-Electio	[INV] Investigation meet with potential expert on issues involving intent behind enactment of the law.	10/03/2013 12:16 - 13:22	[40115] Jose Garza	NC 1.1

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review summaries prepared by Marinda. Confer with counsel on existing case on request by DOJ to stay proceedings. review correspondence.	10/04/2013 08:52 - 10:10	[40115] Jose Garza	1.3
VID07 85B-IND-Electio	[C] Conference w/ confer with MvD on status of case and search for victims of the law.	10/04/2013 10:11 - 10:23	[40115] Jose Garza	0.2
VID07 85B-IND-Electio	[DOC] Document - receive/review recieved and review election data from city of Edinburg. confer with Edith regarding input of data. received and review draft from MvD. confer with MvD.	10/10/2013 09:29 - 11:35	[40115] Jose Garza	2.1
VID07 85B-IND-Electio	[DP] Document - prepare work on draft of complaint. review notes and suggestions from MvD. Review pleadings in place. confer with staff.	10/21/2013 09:15 - 14:15	[40115] Jose Garza	5.0
VID07 85B-IND-Electio	[DP] Document - prepare continue work on complaint. Confer with MvD. Confer with counsel on case already filed. review filed pleadings.	10/22/2013 11:17 - 16:23	[40115] Jose Garza	5.1
VID07 85B-IND-Electio	[DP] Document - prepare worked on draft of complaint. c/w MvD. legal research on venue and relief available.	10/23/2013 13:21 - 15:21	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[C] Conference w/ David and George concerning strategies and sources of information on case. confer with marinda on status of client information.	10/24/2013 16:17 - 17:05	[40115] Jose Garza	0.8
VID07 85B-IND-Electio	[CR] Case Review confer with Marinda on issues. confer with client, (Hernandez) explain status and insure we have approval to proceed. review pleadings.	10/25/2013 16:10 - 17:10	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[DP] Document - prepare continue working on complaint. review edits and suggestions. review sos web page.	10/27/2013 17:52 - 20:28	[40115] Jose Garza	2.6
VID07 85B-IND-Electio	[C] Conference w/ DH, MvD, RD on complaint and process. confer with Gerry Hebert on Davis amendment on "substantially similar" issue. work on new draft. review senate journal.	10/28/2013 09:56 - 12:20	[40115] Jose Garza	2.4
VID07 85B-IND-Electio	[DP] Document - prepare continue working on complaint. (2) confer with MvD. (.8) review Edinburg election material. (1) review senate journal. modify complaint. confer with potential expert. (1) review senate journal on amendments offered. (1.2)	10/29/2013 10:12 - 16:12	[40115] Jose Garza	6.0
VID07 85B-IND-Electio	[CR] Case Review	10/30/2013 15:21 - 17:27	[40115] Jose Garza	NC
VID07 85B-IND-Electio	[DP] Document - prepare continue to work on complaint. review dh edits. review emails on clients. review reports on impact on high profile voters. confer with potential expert.	10/31/2013 09:46 - 13:22	[40115] Jose Garza	3.6
VID07 85B-IND-Electio	[DP] Document - prepare work on v6 of complaint, send around. review email on reporter questions. confer with co-counsel.	11/03/2013 09:49 - 12:31	[40115] Jose Garza	2.7
VID07 85B-IND-Electio	[DP] Document - prepare work on revisions to complaint. research issues of women and the vote in texas. modify fact statement. finalize complaint.	11/05/2013 09:18 - 13:18	[40115] Jose Garza	NC
				4.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review file. review ct's order. review pleadings in Veasey. review emails from DH and RD.	11/06/2013 15:58 - 17:22	[40115] Jose Garza	1.4
VID07 85B-IND-Electio	[CR] Case Review review court's files on related cases. review pending motion to dismiss. review local rules and disclosure requirements.	11/08/2013 12:07 - 14:13	[40115] Jose Garza	2.1
VID07 85B-IND-Electio	[CR] Case Review review file. review emails. confer with Brennan Center and with counsel in MALC AND NAACP legal action.	11/11/2013 12:47 - 13:47	[40115] Jose Garza	NC 1.0
VID07 85B-IND-Electio	[C] Conference w/ DH on potential experts, conversations with other P's counsel and issues of coordination and cooperation.	11/12/2013 08:40 - 09:22	[40115] Jose Garza	NC 0.7
VID07 85B-IND-Electio	[DP] Document - prepare work on issuance of summons, research service of process on state agency officials.	11/12/2013 09:23 - 11:23	[40115] Jose Garza	NC 2.0
VID07 85B-IND-Electio	[C] Conference w/ confer with NAACP plaintiffs' lawyers on coordination and other issues.	11/13/2013 08:20 - 09:14	[40115] Jose Garza	NC 0.9
VID07 85B-IND-Electio	[CR] Case Review review file. review note from SW. reviewed complaint made modifications to refile. conferred with MvD.	11/13/2013 09:28 - 09:58	[40115] Jose Garza	0.5
VID07 85B-IND-Electio	[DP] Document - prepare review edits finalize amended complaint file. review file.	11/14/2013 10:48 - 11:30	[40115] Jose Garza	0.7
VID07 85B-IND-Electio	[CR] Case Review review notes from court on process for hearing on veassey hearing. Confer with Lawyers committee and NAACP.	11/14/2013 11:31 - 12:13	[40115] Jose Garza	0.7
VID07 85B-IND-Electio	[CTC] Court Contact prepare for and attend court hearing in Veassey. Confer with MvD about hearing.	11/15/2013 09:04 - 10:16	[40115] Jose Garza	1.2
VID07 85B-IND-Electio	[MEM] Memorandum, review memo on witness search issues.	11/15/2013 10:17 - 10:29	[40115] Jose Garza	0.2
VID07 85B-IND-Electio	[C] Conference w/ counsel for photo ID plaintiffs. Prepare for same. confer with other trla staff on case. review court's docket. review proposed drafts of pleadings.	11/18/2013 14:39 - 16:39	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review file, review schedules and deadlines, (.5) confer with co-counsel regarding trial preparation and strategies and division of labor. (1.6) review emails on interview schedules with potential experts. (.1)	11/19/2013 16:47 - 18:59	[40115] Jose Garza	2.2
VID07 85B-IND-Electio	[CR] Case Review Review file. research role of sec. of state on service of process. secure address for service of DPS	11/20/2013 13:27 - 15:57	[40115] Jose Garza	2.5
VID07 85B-IND-Electio	defendant, confer with RD, modify summons and file request for issuance. (.8). Review email from ER on issue of coordination between cases. (.2) work on certificate of interested parties, modify and circulate. (.2) Confer with p's counsel in Veassey regarding AG advisory and review AG advisory. confer with ER on same consider impact on Ortiz (1.3)			

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review	11/21/2013 09:02 - 11:14	[40115] Jose Garza	2.2
	review file, review ezra's email. review memo to brennen center et al, modify - confer with Ezra. review dh revisions. send out. review summons issue and email dogget on same. (.9) Research Senate factors, review vote denial cases and search for potential expert. (1.3)			
VID07 85B-IND-Electio	[MTG] Meeting w/	11/22/2013 08:35 - 14:59	[40115] Jose Garza	6.4
	potential experts, Jewell and Leeland. travel to Austin and back. (2.8); meet and confer with Jewell, DH and RD. (1.7); meet and confer with L., DH, RD and MvD. (1.1); prepare for meetings. (.8)			
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	11/26/2013 11:21 - 13:51	[40115] Jose Garza	NC 2.5
	review files, review potential expert qualifications, (1), prepare for meeting with potential expert, Dr. Garcia, review profile and list of articles, (.3), drive to St. Mary's (.2), meet with and interview potential expert, (.9), confer with MvD about same and discuss case issues. (.2)			
VID07 85B-IND-Electio	[CR] Case Review	11/27/2013 11:16 - 12:16	[40115] Jose Garza	NC 1.0
	review file. review emails and data. review notes on conversation with Dr. Cotrell, call and leave message for Dr. Jaramillo, email Jaramillo.			
VID07 85B-IND-Electio	[INV] Investigation	12/02/2013 09:09 - 11:09	[40115] Jose Garza	NC 2.0
	Prepare for and do interview potential expert.			
VID07 85B-IND-Electio	[INV] Investigation	12/04/2013 11:55 - 13:01	[40115] Jose Garza	1.1
	review emails, review resume of potential experts, confer with MvD on same and on meeting with potential expert in Edinburg.			
VID07 85B-IND-Electio	[CR] Case Review	12/08/2013 11:41 - 12:41	[40115] Jose Garza	NC 1.0
	review file.			
VID07 85B-IND-Electio	[IW] Interview Witnesses	12/10/2013 07:56 - 18:20	[40115] Jose Garza	NC 10.4
	travel to edinburg (4), interview potential witness in Edinburg, UTPA professor, (1.3) confer with Co-counsel (.8); travel to Sabestian (.8); interview clients (2); confer with co-counsel (1); travel to Weslaco. (.5)			
VID07 85B-IND-Electio	[DOC] Document - receive/review	12/17/2013 13:12 - 13:54	[40115] Jose Garza	0.7
	received and reviewed state's motion to dismiss, review emails.			
VID07 85B-IND-Electio	[DOC] Document - receive/review	12/19/2013 11:22 - 11:40	[40115] Jose Garza	0.3
	recieved and reviewed motion to dismiss. reviewed staff emails on same.			
VID07 85B-IND-Electio	[R] Research, Legal	12/22/2013 11:24 - 13:24	[40115] Jose Garza	2.0
	continue reviewing motion to dismiss, research issues raised.			
VID07 85B-IND-Electio	[DOC] Document - receive/review	12/23/2013 11:25 - 15:25	[40115] Jose Garza	4.0
	continue review of motion to dismiss. review time requirements for response. work on motion for consolidation. legal research and draft document. review local rules and send out email pursuant to local rules.			
VID07 85B-IND-Electio	[R] Research, Legal	12/30/2013 14:35 - 16:35	[40115] Jose Garza	NC 2.0
	review motion to dismiss. review cases.			

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VID07 85B-IND-Electio	[R] Research, Legal	01/02/2014 10:24 - 14:24	[40115] Jose Garza	4.0
	continue working on motion to dismiss, review cases dealing with sov. immunity and interplay with supplemental jurisdiction issues. (1) Work on pleadings - motion for extension of time and motion to consolidate. (1.5). confer with opposing counsel and with Katy N. (.5), finalize and file motion for extension of time. (.7); conferred with DOJ regarding their position on consolidation. confer with KN on research found. (.3).			
VID07 85B-IND-Electio	[R] Research, Legal	01/03/2014 10:27 - 12:45	[40115] Jose Garza	2.3
	review cases and continue working on response to motion to dismiss. (Raygor v. Regents of U of Minn.) review arc of california case. (2). confer with Katy on research and drafting issues. (.3)			
VID07 85B-IND-Electio	[C] Conference w/	01/03/2014 12:46 - 13:46	[40115] Jose Garza	NC 1.0
	prepare for conference with team. review motion and malc response. review notes. confer with RD and MvD and KN. review cases.			
VID07 85B-IND-Electio	[CR] Case Review	01/03/2014 13:47 - 15:05	[40115] Jose Garza	1.3
	review file. confer with MvD on schedule. review emails. continue work on response to motion to dismiss.			
VID07 85B-IND-Electio	[C] Conference w/	01/07/2014 14:07 - 16:07	[40115] Jose Garza	2.0
	confer with mvd and rd. work on brief in response.			
VID07 85B-IND-Electio	[DP] Document - prepare	01/08/2014 10:08 - 15:50	[40115] Jose Garza	5.7
	continue working on response brief to motion to dismiss. begin draft, review cases.			
VID07 85B-IND-Electio	[DP] Document - prepare	01/09/2014 10:26 - 16:02	[40115] Jose Garza	5.6
	continue working on brief in opp. to motion to dismiss. review amended complaint, responses of legal defense fund and malc. send out draft to co-counsel.(5) call doj on consolidation motion. finalize consolidation motion, file. (.5); confer with MvD. (.1)			
VID07 85B-IND-Electio	[DP] Document - prepare	01/10/2014 10:47 - 14:05	[40115] Jose Garza	3.3
	continue working on memo in opp. review edits of co-counsel, work on last section. review recent 5th cir. case on supp. jurisdiction. review court's order on consolidation.			
VID07 85B-IND-Electio	[DP] Document - prepare	01/12/2014 12:55 - 16:37	[40115] Jose Garza	3.7
	work on response to motion to dismiss. review latest edits from MvD and RD.			
VID07 85B-IND-Electio	[DP] Document - prepare	01/13/2014 11:12 - 17:42	[40115] Jose Garza	6.5
	continue working on brief. review organizational standing issue. review additional edits. work on voting procedures covered by sec. 2 . modify brief on standing issues, and regarding defendants' claims regarding procedural modifications to election rules. review edits, finalize and file.			
VID07 85B-IND-Electio	[C] Conference w/	01/16/2014 09:00 - 09:12	[40115] Jose Garza	0.2
	discuss schedule and discovery with MvD			
VID07 85B-IND-Electio	[CR] Case Review	01/16/2014 09:13 - 10:13	[40115] Jose Garza	NC 1.0
	review file, emails, and review schedule. organize file.			
VID07 85B-IND-Electio	[C] Conference w/	01/17/2014 16:04 - 17:04	[40115] Jose Garza	1.0
	confer and go over schedules and work assignments with team. confer with DOJ on status of case and secure documents already on file in discovery etc.			
VID07 85B-IND-Electio	[CR] Case Review	01/21/2014 11:10 - 13:10	[40115] Jose Garza	2.0
	review data analysis draft agreement. confer with counsel in Veasey and NAACP. review emails from RD.			

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**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review file, confer with co-counsel and expert. review correspondence.	01/22/2014 09:42 - 11:00	[40115] Jose Garza	1.3
VID07 85B-IND-Electio	[C] Conference w/ with all plaintiffs group on coordination and strategy discussion.	01/22/2014 11:01 - 12:13	[40115] Jose Garza	1.2
VID07 85B-IND-Electio	[DOC] Document - receive/review receive and review DOJ document on wording with data. confer with Marinda, and confer with other P's counsel. call DOJ.	01/24/2014 15:42 - 18:00	[40115] Jose Garza	2.3
VID07 85B-IND-Electio	[CR] Case Review work on expert instructions, review file. confer with Marinda.	01/27/2014 10:00 - 11:00	[40115] Jose Garza	NC 1.0
VID07 85B-IND-Electio	[CR] Case Review review file, legal research.	02/03/2014 10:13 - 13:13	[40115] Jose Garza	3.0
VID07 85B-IND-Electio	[DNR] Deposition - Review/Summarize review discovery documents and drafts of proposed discovery process and document processing strategies sent out by DOJ. confer with co-counsel and counsel for other plaintiffs. review courts' schedule and hearing schedule.	02/04/2014 10:14 - 15:14	[40115] Jose Garza	5.0
VID07 85B-IND-Electio	[CR] Case Review review file. participate in tel. conference on status of data gathering and matching process. review emails, review documents from DOJ.	02/05/2014 09:34 - 11:04	[40115] Jose Garza	1.5
VID07 85B-IND-Electio	[CR] Case Review and conference with other counsel on the case and DOJ.	02/05/2014 11:05 - 11:11	[40115] Jose Garza	0.1
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs) confer with expert regarding discovery material. (.7) travel to Austin (1.5); prepare for potential witness interview. (.5); interview potential witness on legislative process. LF (1.8); travel to San Antonio. (1.6).	02/06/2014 10:00 - 16:06	[40115] Jose Garza	6.1
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) begin to prepare for wed. hearing. review motion to dismiss, review cases, and response. review file. confer with staff, and counsel in other cases.	02/10/2014 09:59 - 13:59	[40115] Jose Garza	4.0
VID07 85B-IND-Electio	[CR] Case Review review documents on discovery - confer with DOJ, NAACP Legal Defense Fund and Ezra Rosenberg. review data from Kathleen, review emails from MVD and JLavariega.	02/11/2014 08:50 - 10:50	[40115] Jose Garza	NC 2.0
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) review motions from DOJ, and motion to dismiss. confer with MVD and RD, on issues for hearing tomorrow. (2) travel to CC (2.5)	02/11/2014 10:51 - 15:21	[40115] Jose Garza	4.5
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) confer with Chadd Dunn and Armond Derfner from Veasey Ps, and Ezra R. from NAACP about hearing and issues involved. (1)	02/11/2014 15:22 - 16:22	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[HG] Hearing attend court hearing on discovery issues in CC. (1.2) confer and debrief with co-counsel. (1); travel to SA (2.5).	02/12/2014 11:36 - 16:18	[40115] Jose Garza	4.7

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VID07 85B-IND-Electio	[CR] Case Review confer with expert (Lavariega), (.4); confer with co-counsel. (.3); Discuss issues with Counsel for Hisp. county judges, discuss common areas, potential common research issues dealing with hidalgo county, (.5)	02/13/2014 10:30 - 11:42	[40115] Jose Garza	NC	1.2
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) prepare for hearing on potential agreed order on exchange of data to be matched. review drafts of "agreement" confer with co-counsel, etc.	02/14/2014 10:54 - 12:06	[40115] Jose Garza	NC	1.2
VID07 85B-IND-Electio	[HG] Hearing Hearing on discovery and scheduling issues.	02/14/2014 12:07 - 12:37	[40115] Jose Garza	NC	0.5
VID07 85B-IND-Electio	[CR] Case Review review drafts of compromise language. confer with co-counsel. review emails from counsel and from the court.	02/14/2014 12:38 - 13:20	[40115] Jose Garza	NC	0.7
VID07 85B-IND-Electio	[CR] Case Review review draft of expert report. (.4); confer with expert, KJ and co-counsel. (.6); review emails and files. (.2)	02/18/2014 10:12 - 11:24	[40115] Jose Garza	NC	1.2
VID07 85B-IND-Electio	[CR] Case Review confer with lawyers committee on possible experts of rbv.	02/18/2014 11:25 - 11:43	[40115] Jose Garza	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review reviewed court orders, and new filings by State. (.7) reviewed emails and new material from counties. (.5).	02/19/2014 11:34 - 12:46	[40115] Jose Garza	NC	1.2
VID07 85B-IND-Electio	[CR] Case Review review emails on conference call and identification of experts, confer with staff on same and schedule. confer with Ezra Rosenberg concerning issues for conference call. review responses to motion for legislative privilege protective order. Review In re Perry.	02/20/2014 09:09 - 11:09	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CR] Case Review prepare for cross party conference call. review emails, review court docket.	02/20/2014 11:10 - 11:22	[40115] Jose Garza	NC	0.2
VID07 85B-IND-Electio	[C] Conference w/ plaintiff group on this case.	02/20/2014 11:23 - 12:29	[40115] Jose Garza	NC	1.1
VID07 85B-IND-Electio	[CR] Case Review review emails and drafts of legal documents. confer with MvD and RD. review legal brief on leg. privilege and edits suggested. confer with MPosner. call ER.	02/24/2014 09:35 - 11:35	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review documents on data match and on legislative privilege issues (1). confer with expert and co-counsel (.8). travel to CC for hearing (3). review emails, confer with Katy regarding pending motions and possible new motions. (.2)	03/04/2014 10:42 - 15:42	[40115] Jose Garza	NC	5.0
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) review court's docket, pull documents and review for tomorrow's hearing. Confer with RR, organize hearing notebook.	03/04/2014 15:43 - 17:25	[40115] Jose Garza	NC	1.7
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) review motion and responses on leg. privilege, review drafts of proposed trial, discovery, etc. schedules.	03/05/2014 08:24 - 09:36	[40115] Jose Garza	NC	1.2
VID07 85B-IND-Electio	[HG] Hearing court hearing on outstanding issues (leg. privilege and motion to compel production).	03/05/2014 09:37 - 11:37	[40115] Jose Garza	NC	2.0

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**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[TV] Travel travel to Edinburg for meeting with expert.	03/05/2014 11:38 - 14:38	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[CR] Case Review review file, confer with co-counsel. (.3). travel to Weslaco for meeting with DH. (.5)	03/05/2014 15:40 - 16:28	[40115] Jose Garza	NC	0.8
VID07 85B-IND-Electio	[C] Conference w/ with DH. Update status of case and costs issues.	03/06/2014 09:34 - 10:46	[40115] Jose Garza	NC	1.2
VID07 85B-IND-Electio	[TV] Travel travel to San Antonio.	03/06/2014 10:47 - 15:17	[40115] Jose Garza	NC	4.5
VID07 85B-IND-Electio	[CR] Case Review confer with MvD on status of open records requests. review emails and "script" discuss modifications with MvD. review emails from doj, review letter drafted by Texas OAG at request of court. respond to suggestion from doj. review edits, and other email responses.	03/07/2014 10:34 - 11:10	[40115] Jose Garza		0.6
VID07 85B-IND-Electio	[CR] Case Review confer with katy on records issues. review email from JL.	03/10/2014 09:06 - 09:18	[40115] Jose Garza	NC	0.2
VID07 85B-IND-Electio	[CR] Case Review review file, review schedule. confer with Vessey counsel on issues to be discussed at hearing on the 26th.	03/18/2014 11:33 - 12:03	[40115] Jose Garza		0.5
VID07 85B-IND-Electio	[C] Conference w/ Jessica L. on status of data collection, confer with Kathleen on same. review emails on same.	03/18/2014 12:04 - 12:22	[40115] Jose Garza	NC	0.3
VID07 85B-IND-Electio	[CR] Case Review review emails between counsel, review deposition schedule and begin review rpd discovery requests. Confer with Chad Dunn regarding deposition schedule. Confer with Gerry Hebert regarding request for production requests and expert analysis.	03/25/2014 09:11 - 12:41	[40115] Jose Garza		3.5
VID07 85B-IND-Electio	[CR] Case Review Review file. confer with KN, review pleadings and trial and hearing schedule. call client and confer.	03/31/2014 10:23 - 11:23	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) Travel to CC, (2.6); confer with MvD regarding hearing, client issues, expert issues, etc. (1.4); review motions, briefs etc. for hearing prep. (1).	03/31/2014 11:24 - 16:24	[40115] Jose Garza		5.0
VID07 85B-IND-Electio	[TP] Trial, prep prepare for and attend hearing on scheduling issues and discovery issues. (2.8); confer with co-counsel on client issues, discovery responses, etc. (1); interview client Ortiz (1.2); interview client Taylor (2.4); travel to San antonio (2.7).	04/01/2014 07:29 - 17:35	[40115] Jose Garza		10.1
VID07 85B-IND-Electio	[C] Conference w/ doj and the state of texas on discovery issues.	04/02/2014 13:00 - 13:30	[40115] Jose Garza	NC	0.5
VID07 85B-IND-Electio	[C] Conference w/ doj, state and other plaintiffs on scheduling order and discovery issues.	04/02/2014 13:31 - 14:13	[40115] Jose Garza		0.7
VID07 85B-IND-Electio	[CR] Case Review review schedules, review emails, review MvD's outline of issues. confer with Katy on motions needed. (motion to dismiss Rox. Her.)	04/02/2014 14:14 - 15:14	[40115] Jose Garza		1.0

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**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review	04/03/2014 12:31 - 13:43	[40115] Jose Garza	1.2
	review file. review emails and correspondence. Confer with MvD and Ezra R regarding time issues and deposition coverage issues.			
VID07 85B-IND-Electio	[CR] Case Review	04/04/2014 13:22 - 16:22	[40115] Jose Garza	NC 3.0
	review email, review pleadings filed, review election records and communications.			
VID07 85B-IND-Electio	[C] Conference w/	04/11/2014 02:24 - 03:24	[40115] Jose Garza	NC 1.0
	co-counsel and expert. review status of case. confer regarding contract issues. etc.			
VID07 85B-IND-Electio	[DOC] Document - receive/review	04/14/2014 09:11 - 11:11	[40115] Jose Garza	2.0
	review advisory from Ezra, confer w/MvD regarding same, review Hebert Edits, confer with Ezra regarding same. (1); Confer with MvD regarding current schedule (.3); confer with Katy on pleadings needed for filing on Roxanne, etc. (.2); review emails and other correspondence. (.5).			
VID07 85B-IND-Electio	[C] Conference w/	04/16/2014 08:28 - 10:28	[40115] Jose Garza	NC 2.0
	expert and co-counsel regarding status of research. (.4); review file, emails, filings. (.7); court hearing on motions to compel (.9)			
VID07 85B-IND-Electio	[C] Conference w/	04/17/2014 10:02 - 11:14	[40115] Jose Garza	NC 1.2
	co-counsel regarding status of case, schedule and discovery issues. (.8); review emails, filings, correspondence, etc. (.4);			
VID07 85B-IND-Electio	[C] Conference w/	04/17/2014 11:15 - 13:15	[40115] Jose Garza	2.0
	all plaintiffs' counsel, and DOJ on status of schedule, discovery, trial strategy, etc. review RFPS. (2)			
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/17/2014 13:16 - 13:58	[40115] Jose Garza	0.7
	reviewed RFPS and interrogatories. communicate with Emma from Veassey Ps about modifications. Conferred with Doggett and MvD.			
VID07 85B-IND-Electio	[CR] Case Review	04/21/2014 12:59 - 14:11	[40115] Jose Garza	1.2
	confer with MvD regarding current schedule, events, etc. (.2); prepare for and participate in conference call with other P counsel regarding discovery and depositions. (.7); review schedule and respond to emails and calls. (.3)			
VID07 85B-IND-Electio	[CR] Case Review	04/22/2014 10:47 - 11:53	[40115] Jose Garza	1.1
	review file, review schedule. respond to emails. (.3); Jewell weekly conf. call. (.5); confer with other plaintiffs on deposition for tomorrow. (.3)			
VID07 85B-IND-Electio	[TV] Travel	04/23/2014 06:47 - 10:47	[40115] Jose Garza	4.0
	to Austin for deposition and back.			
VID07 85B-IND-Electio	[DNP] Deposition - Prep	04/23/2014 10:48 - 11:30	[40115] Jose Garza	0.7
	review files, confer with P's counsel and co-counsel. (.7)			
VID07 85B-IND-Electio	[DEP] Deposition - Take	04/23/2014 11:31 - 15:31	[40115] Jose Garza	4.0
	of K. Ingram, 30 b 6, for SOS.			
VID07 85B-IND-Electio	[CR] Case Review	04/25/2014 10:55 - 12:01	[40115] Jose Garza	1.1
	review file, (.2) receive and review document: state's motion to quash on behalf of 3rd party legislators. (.3) review agenda for conference call and review emails on same, modifications and discussion. (.2); review master calendar (.1); review Derfner letter, and court's email. (.3)			
VID07 85B-IND-Electio	[TV] Travel	04/28/2014 15:35 - 19:35	[40115] Jose Garza	4.0
	travel to the valley for meeting with Juanita and Marinda.			

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**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[DISC] Discovery (drafting docs) meeting with Juanita from UNION del Pueblo. discuss discovery document requested by State. Review and update status of case. confer with Marinda. (1.7) Travel to San Antonio. (4.3)	04/29/2014 12:25 - 18:25	[40115] Jose Garza	6.0
VID07 85B-IND-Electio	[CR] Case Review review emails, review outline from expert. update file.	05/01/2014 10:39 - 13:15	[40115] Jose Garza	NC 2.6
VID07 85B-IND-Electio	[C] Conference w/ Marinda, RD and Jessica. Discuss status of analysis and modifications that should be included. Confer with M and R about schedule. review file. confer with Ezra and Marty on schedule. discuss options.	05/05/2014 09:43 - 12:49	[40115] Jose Garza	NC 3.1
VID07 85B-IND-Electio	[CR] Case Review review file, review pleadings filed. confer with MvD. review emails from other counsel.	05/06/2014 13:18 - 14:18	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[CR] Case Review review email, review discovery documents submitted by doj. confer with staff.	05/08/2014 12:11 - 14:11	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[C] Conference w/ all plaintiff counsel - review variety of issues on status of case.	05/08/2014 14:12 - 14:54	[40115] Jose Garza	NC 0.7
VID07 85B-IND-Electio	[CR] Case Review review files, confer with counsel for plaintiffs on deposition schedules. review filings.	05/14/2014 10:05 - 12:05	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[HG] Hearing status hearing with the court on outstanding matters. (1) review file. confer with MvD. review emails on motions and schedules. (.2)	05/15/2014 08:39 - 09:51	[40115] Jose Garza	1.2
VID07 85B-IND-Electio	[CR] Case Review review emails, review drafts of privilege agreement. review deposition schedule. confer with mark posner. (1)	05/21/2014 14:05 - 15:05	[40115] Jose Garza	NC 1.0
VID07 85B-IND-Electio	[CR] Case Review review file, review email exchanges on discovery and expert deposition schedules.	08/01/2014 15:47 - 16:47	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) organize file. (1); review emails regarding expert depositions. (.2); review new filings, review defendants' expert reports. (1.8); review and calendar notice of depositions. (.4).	08/02/2014 11:00 - 14:24	[40115] Jose Garza	3.4
VID07 85B-IND-Electio	[DNP] Deposition - Prep review korbel report (1); review correspondence on discovery issues and deposition schedule. (.3); review to do list, review emails and other correspondence. (.2); organize file. (.7).	08/04/2014 16:41 - 18:53	[40115] Jose Garza	2.2
VID07 85B-IND-Electio	[TP] Trial, prep confer with MvD, review expert reports, review client fact sheet. Review Korbel exhibits, Korbel deposition.	08/05/2014 16:10 - 18:10	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[TP] Trial, prep review communications on expert depositions. review proposed stip. review email from RD and MvD. Confer with Korbel on his deposition. review and organize file.	08/06/2014 17:25 - 18:19	[40115] Jose Garza	0.9
VID07 85B-IND-Electio	[CR] Case Review REVIEW EMAILS, REVIEW NEW PLEADINGS AND DISCUSSIONS ON FOF AND WITNESS ORDER. REVIEW DOJ MOTION TO DEEM ADMITTED AND MOTION TO STRIKE ANSWER.	08/08/2014 09:47 - 11:47	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[TP] Trial, prep review def's filings. review depositions.	08/18/2014 17:07 - 19:19	[40115] Jose Garza	2.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[TP] Trial, prep review file, legal research. review correspondence, confer with doj lawyer freeman.	08/19/2014 09:06 - 11:06	[40115] Jose Garza	2.0	
VID07 85B-IND-Electio	[TP] Trial, prep review emails on final depositions and schedules. review court orders. review jewell report and review exhibit lists.	08/21/2014 16:03 - 18:51	[40115] Jose Garza	2.8	
VID07 85B-IND-Electio	[TP] Trial, prep review drafts of FOF, confer with Ezra. Review emails on discovery disputes. Legal research.	08/22/2014 15:02 - 18:02	[40115] Jose Garza	3.0	
VID07 85B-IND-Electio	[TP] Trial, prep review dc record, review proposed findings of fact etc.	08/27/2014 09:57 - 12:27	[40115] Jose Garza	2.5	
VID07 85B-IND-Electio	[TP] Trial, prep review court's orders, review parties communications on order of witnesses. Confer with potential witnesses.	08/27/2014 12:28 - 13:28	[40115] Jose Garza	1.0	
VID07 85B-IND-Electio	[TP] Trial, prep review expert reports, prepare logistics for trial. organize files.	08/29/2014 11:24 - 13:54	[40115] Jose Garza	2.5	
VID07 85B-IND-Electio	[TP] Trial, prep review summaries of client facts, review depositions of clients. review witness depositions.	08/31/2014 10:47 - 16:47	[40115] Jose Garza	6.0	
VID07 85B-IND-Electio	[TL] Trial trial in CC. Attend trial, present witness, opening statement. (8.7); trial preparation for next day, review transcripts, confer with co-counsel and other p's counsel. (1.5)	09/02/2014 07:20 - 17:32	[40115] Jose Garza	10.2	
VID07 85B-IND-Electio	[TL] Trial Trial (9), ass't with witness prep. (2); confer with co-counsel (1); confer with other P's counsel (.3).	09/03/2014 07:20 - 19:38	[40115] Jose Garza	12.3	
VID07 85B-IND-Electio	[TL] Trial trial (9); trial prep. (3)	09/04/2014 07:20 - 19:20	[40115] Jose Garza	NC	12.0
VID07 85B-IND-Electio	[TL] Trial trial (8); travel to SA (2.8)	09/05/2014 07:20 - 18:08	[40115] Jose Garza	10.8	
VID07 85B-IND-Electio	[CR] Case Review review transcripts of last weeks trial. Review emails, confer with staff.	09/08/2014 10:15 - 12:15	[40115] Jose Garza	2.0	
VID07 85B-IND-Electio	[CR] Case Review review trial transcript, review emails description of case, and issues arising.	09/10/2014 09:12 - 12:12	[40115] Jose Garza	3.0	
VID07 85B-IND-Electio	[TP] Trial, prep review trial transcripts, review findings of fact drafts	09/13/2014 14:18 - 17:18	[40115] Jose Garza	3.0	
VID07 85B-IND-Electio	[TP] Trial, prep review discovery responses, review trial transcripts, confer with counsel. review COL drafts.	09/15/2014 15:20 - 18:20	[40115] Jose Garza	3.0	
VID07 85B-IND-Electio	[TP] Trial, prep review new transcripts, review fof and col drafts, confer with counsel.	09/17/2014 15:24 - 19:24	[40115] Jose Garza	4.0	
VID07 85B-IND-Electio	[CR] Case Review review file, review time lines. confer with staff.	09/25/2014 13:28 - 16:28	[40115] Jose Garza	3.0	
VID07 85B-IND-Electio	[CR] Case Review review emails circulating. review research on possible stay. review status of Wisconsin appeal.	09/30/2014 15:50 - 19:50	[40115] Jose Garza	4.0	

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review court's order. confer with staff regarding issues raised by opinion.	10/09/2014 19:21 - 23:21	[40115] Jose Garza	NC	4.0
VID07 85B-IND-Electio	[R] Research, Legal review court's order, review draft of response to state's advisory. confer with co-counsel. review local rules for atty fee deadlines.	10/10/2014 12:52 - 15:52	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review State's mandamus request and alternative motion for stay. review drafts of responses - review 5th cir. order and filings. confer with RD and MvD.	10/12/2014 12:11 - 15:11	[40115] Jose Garza		3.0
VID07 85B-IND-Electio	[CR] Case Review review emails, confer with co-counsel. review draft pleadings. sup. court orders.	10/15/2014 13:52 - 16:22	[40115] Jose Garza		2.5
VID07 85B-IND-Electio	[CR] Case Review review file, organize files. review emails regarding atty's fees.	10/16/2014 12:54 - 14:54	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) review trial transcript. review appellate court rules for 5th cir. appeal.	10/17/2014 10:55 - 13:55	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[CR] Case Review review file, review correspondense on proposed court order. confer with co-counsel.	10/20/2014 16:49 - 19:19	[40115] Jose Garza		2.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review draft motions on atty's fees. confer with staff. review rules of civil procedure and local rules.	10/21/2014 10:50 - 12:50	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review file, review and organize files from trial.	10/28/2014 09:53 - 14:53	[40115] Jose Garza	NC	5.0
VID07 85B-IND-Electio	[R] Research, Legal review sup ct. cases on section 2 standards, review 3c orders, review file, organize same.	11/05/2014 13:33 - 16:33	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[CR] Case Review review file, review email correspondence, review filings	11/10/2014 14:32 - 16:20	[40115] Jose Garza	NC	1.8
VID07 85B-IND-Electio	[CR] Case Review review filings on exhibits for 5th cir.	11/11/2014 14:32 - 17:02	[40115] Jose Garza		2.5
VID07 85B-IND-Electio	[CR] Case Review review file, review filings, confer with co-counsel	11/13/2014 11:08 - 13:08	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CR] Case Review review file, review exhibits in the case, review outline for 5th cir. appeal, confer with MvD.	11/14/2014 10:06 - 12:06	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[CR] Case Review review email from MP, review file.	11/18/2014 10:41 - 11:41	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CR] Case Review review emails from Posner, review proposed outline for 5th cir. issues, Review response to Veasey motion to expedite, review file.	11/18/2014 11:42 - 13:42	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CR] Case Review review file and review emails - review filed pleadings	11/25/2014 15:36 - 17:36	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[CR] Case Review review email from posner, review drafts of outline for 5th cir. brief.	12/01/2014 17:29 - 19:47	[40115] Jose Garza	NC	2.3
VID07 85B-IND-Electio	[CR] Case Review Review file, Organize, review transcript provisions.	12/02/2014 17:41 - 20:41	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review motion from Veasey group and posner draft response.	12/03/2014 14:30 - 16:30	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[CR] Case Review review emails on motion to expedite and conference call set up, review files.	12/04/2014 13:33 - 15:33	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CR] Case Review confer with Ezra, review emails, review transcript of TRLA witnesses.	12/05/2014 17:42 - 19:54	[40115] Jose Garza		2.2
VID07 85B-IND-Electio	[CR] Case Review confer with posner and review emails on issues in case.	12/08/2014 11:36 - 14:00	[40115] Jose Garza	NC	2.4
VID07 85B-IND-Electio	[CR] Case Review review transcript of TRLA witnesses at trial.	12/15/2014 09:53 - 10:53	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[C] Conference w/ confer with Posner on status of briefing and assignments to different parties, review calendar for appeal, review recent argument at the Sup. Ct. on voting case.	12/16/2014 09:49 - 12:49	[40115] Jose Garza		3.0
VID07 85B-IND-Electio	[C] Conference w/ with Mark Posner on status of case and issues needed to be developed, reviewed file.	12/17/2014 12:44 - 15:44	[40115] Jose Garza	NC	3.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review file.	12/19/2014 09:52 - 10:52	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CR] Case Review review file, review requests and emails on different topics. Confer with MvD on status of clients and on our role on appeal.	01/06/2015 10:10 - 11:22	[40115] Jose Garza		1.2
VID07 85B-IND-Electio	[CR] Case Review review file. review emails, review docket.	01/09/2015 15:22 - 16:04	[40115] Jose Garza	NC	0.7
VID07 85B-IND-Electio	[CR] Case Review review transcripts of trial and expert reports - examine for testimony on 2/3 rule.	01/12/2015 09:07 - 13:07	[40115] Jose Garza	NC	4.0
VID07 85B-IND-Electio	[CR] Case Review continue review of trial record for testimony and exhibits discussing 2/3rds rule.	01/13/2015 09:08 - 12:38	[40115] Jose Garza	NC	3.5

VID07 85B-IND-Electio	[C] Conference w/ Mark Posner and Jerry Hebert on process for review of State's brief, as well possible meeting in March in Austin.	01/20/2015 11:12 - 12:12	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review filing by state on counsel appearance. (.3); review file. (.7)	01/21/2015 09:20 - 10:20	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[ADM] Administrative / Office Matters confer with staff, review files.	01/21/2015 10:21 - 12:21	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CR] Case Review review emails from Posner on schedule and strategy for briefing. review file.	01/21/2015 12:22 - 13:10	[40115] Jose Garza	NC	0.8
VID07 85B-IND-Electio	[CR] Case Review review court's order, review emails. (1)	01/23/2015 09:22 - 10:22	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and began review of state's brief and record excerpts.	01/27/2015 17:03 - 19:03	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[C] Conference w/ MvD regarding emails and schedule.	01/28/2015 09:35 - 09:53	[40115] Jose Garza		0.3
VID07 85B-IND-Electio	[CR] Case Review continue to review record excerpts, review email, confer with MP about conference call schedule.	01/28/2015 09:54 - 11:54	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[C] Conference w/ with mark posner concerning conf. call topics and gen. status of appeal. begin review of state's brief.	01/29/2015 16:34 - 18:34	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[CR] Case Review review emails on amicus and Dallas county status in case.	02/04/2015 16:14 - 17:14	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed amicus brief.	02/05/2015 16:10 - 18:10	[40115] Jose Garza		2.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review filings and emails between counsel. review discussion on sealed documents.	02/17/2015 16:49 - 17:37	[40115] Jose Garza	0.8
VID07 85B-IND-Electio	[DOC] Document - receive/review review corrected brief from state.	02/18/2015 17:53 - 18:53	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[CR] Case Review review file, review state's brief. Confer with bob kengle at lawyer's committee regarding status of brief.	02/26/2015 09:40 - 11:40	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[CR] Case Review review file, review state's brief, review record excerpts, transcript etc.	02/27/2015 15:41 - 17:29	[40115] Jose Garza	1.8
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed drafts of brief.	03/02/2015 10:31 - 11:31	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review recieved and reviewed drafts of our brief to the 5th cir. confer with MVD. Confer with Lawyer's Committee lawyers.	03/03/2015 12:30 - 14:30	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed briefs filed by appellees and USA. review emails on request for extension of time on reply brief.	03/04/2015 13:28 - 15:40	[40115] Jose Garza	2.2
VID07 85B-IND-Electio	[CR] Case Review review file, confer with lawyer's committee on schedule. review briefs on file.	03/09/2015 09:20 - 12:20	[40115] Jose Garza	3.0
VID07 85B-IND-Electio	[DOC] Document - receive/review recieved and reviewed amicus briefs.	03/10/2015 10:21 - 13:21	[40115] Jose Garza	3.0
VID07 85B-IND-Electio	[CR] Case Review review emails, review briefs and review impact of sc's dec. in Wis. case.	03/25/2015 16:13 - 18:55	[40115] Jose Garza	2.7
VID07 85B-IND-Electio	[CR] Case Review review file, confer with Ezra and MvD.	03/31/2015 11:13 - 11:49	[40115] Jose Garza	0.6
VID07 85B-IND-Electio	[CR] Case Review review file, review emails on argument. confer with co-counsel.	04/01/2015 13:52 - 14:52	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review reply brief. review correspondence from clerk of the 5th cir. look up appearance form. to review schedule for travel to argument.	04/02/2015 10:52 - 12:52	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[CR] Case Review review emails, review logistics for argument. review 5th cir. calendar.	04/06/2015 10:22 - 10:40	[40115] Jose Garza	0.3
VID07 85B-IND-Electio	[C] Conference w/ conference in prep. for oral argument. all groups included.	04/15/2015 10:06 - 10:48	[40115] Jose Garza	0.7
VID07 85B-IND-Electio	[DOC] Document - receive/review review topics considered for oral argument submitted by ldf. review our brief.	04/15/2015 10:49 - 12:31	[40115] Jose Garza	1.7
VID07 85B-IND-Electio	[CR] Case Review review file, review panel make up. review emails regarding moot court schedule.	04/21/2015 13:46 - 14:16	[40115] Jose Garza	0.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review file. finalize logistical issues on oral argument travel.	04/23/2015 16:39 - 17:03	[40115] Jose Garza	NC	0.4
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) organize file. review appellate briefs. (1.2); wait at the airport to travel to N. O., flight cancelled as we waited on the plain. (2); confer with MvD and Chad Dunn. (.2)	04/27/2015 11:23 - 14:47	[40115] Jose Garza	NC	3.4
VID07 85B-IND-Electio	[CR] Case Review review and listen to oral arguement at 5th cir. (.9) review file and organize. (.2)	04/29/2015 10:56 - 12:02	[40115] Jose Garza	NC	1.1
VID07 85B-IND-Electio	[CR] Case Review review filing by the state. review request from Ezra on response.	05/28/2015 11:51 - 12:51	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review state's letter brief and drafts of doj response. confer with co-counsel and review email.	05/29/2015 10:30 - 11:48	[40115] Jose Garza	NC	1.3
VID07 85B-IND-Electio	[DOC] Document - receive/review review filings by Ezra etc.	06/01/2015 18:31 - 19:31	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CR] Case Review review new correspondence from state and co-counsel. review draft letter to 5th cir. and respond.	06/25/2015 09:31 - 11:31	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[CR] Case Review review recent filings with 5th cir. review recent rulings.	07/08/2015 10:35 - 11:35	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[CR] Case Review reviewed files. reviewed 5th cir. rules.	07/17/2015 10:55 - 11:55	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed 5th cir. dec. confer with MVD and with other P's counsel.	08/05/2015 14:04 - 16:34	[40115] Jose Garza		2.5
VID07 85B-IND-Electio	[C] Conference w/ lawyers committee attys. confer with DHall Doggett and MVD on our position moving forward.	08/06/2015 15:19 - 16:01	[40115] Jose Garza	NC	0.7
VID07 85B-IND-Electio	[CR] Case Review review file for deadlines on fees, scope of stay. review emails.	08/07/2015 15:25 - 17:25	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[CR] Case Review review file, confer with lawyers committee and brennan center counsel on next steps.	08/10/2015 16:05 - 17:35	[40115] Jose Garza		1.5
VID07 85B-IND-Electio	[CR] Case Review review emails, confer with MvD and with ER. review file.	08/12/2015 11:01 - 12:07	[40115] Jose Garza	NC	1.1
VID07 85B-IND-Electio	[CR] Case Review review file. review 5th cir. op. and review perry; review status of id challenges in other states.	08/13/2015 15:13 - 16:13	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[CR] Case Review review file. review emails on status of motion for interim relief. confer with Ezra on same. review 5th cir. dec.	08/20/2015 08:02 - 09:02	[40115] Jose Garza		1.0
VID07	[DOC] Document - receive/review review motions filed, review emails on possible meetings. review file	08/21/2015 10:13 - 10:37	[40115] Jose Garza	NC	0.4

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07

	[CR] Case Review review reply brief.	09/18/2015 16:02 - 17:02	[40115] Jose Garza	1.0
85B-IND-Electio	[CR] Case Review review file and prepare for conference call. participate in call.	12/17/2015 13:17 - 14:17	[40115] Jose Garza	NC 1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed filings by doj and legal defense fund. organize file. confer with co counsel.	12/22/2015 15:41 - 17:41	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[CR] Case Review review file, confer with co-counsel, telephone conference on status of case on appeal.	02/08/2016 12:01 - 12:19	[40115] Jose Garza	NC 0.3
VID07 85B-IND-Electio	[CR] Case Review review file and prepare for phone conference. on conference call.	02/09/2016 14:11 - 16:23	[40115] Jose Garza	NC 2.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review files, review emails, confer with Ezra on phone conference aftermath.	02/10/2016 16:09 - 16:45	[40115] Jose Garza	NC	0.6
VID07 85B-IND-Electio	[CR] Case Review prepare for conference call. review file. review status of case. review court's orders.	02/16/2016 12:27 - 13:27	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[C] Conference w/ lawyer's committee on status and pending issues. review file.	02/22/2016 12:27 - 13:27	[40115] Jose Garza		1.0

VID07 85B-IND-Electio	[DOC] Document - receive/review reviewed and reviewed most recent motion from Veasey. Recieved and reviewed order and scheduling from 5th cir. on en banc consideration. confer with legal team. review email correspondence on same.	03/09/2016 13:57 - 17:39	[40115] Jose Garza		3.7
VID07 85B-IND-Electio	[CR] Case Review review file, review briefs already filed. review nc case.	03/14/2016 13:50 - 15:50	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[CR] Case Review reviewed orders from 5th cir. regarding briefs and paper copies. Confer with RRios regarding his position and status on en banc review.	03/29/2016 09:19 - 10:19	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CR] Case Review confer with counsel. review recent filings and pleadings.	04/05/2016 11:53 - 12:53	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[CR] Case Review review recent voting dec. from sup. court. discuss possible ramification here.	04/07/2016 12:00 - 14:00	[40115] Jose Garza		2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review state's response at sc. revie scotus blog articles on pending motion.	04/12/2016 12:34 - 13:34	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[CR] Case Review prepare for conference call on status and new issues. review emails, review oral argument audio.	06/01/2016 09:02 - 10:44	[40115] Jose Garza		1.7
VID07 85B-IND-Electio	[CR] Case Review review draft of rule 28j, review emails for conf. call this afternoon.	06/01/2016 10:45 - 12:03	[40115] Jose Garza	NC	1.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[C] Conference w/ litigation team on status and strategy post oral argument. issues to discuss: DOJ suggestions re sup ct. order; issues raised during oral argument; what to do if no dec. by July 20; possible outcomes post argument.	06/01/2016 12:04 - 13:04	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review and organize files, review en banc argument.	06/06/2016 11:50 - 13:20	[40115] Jose Garza		1.5
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files and briefs. check on opinions from court.	06/20/2016 11:00 - 12:18	[40115] Jose Garza	NC	1.3
VID07 85B-IND-Electio	[R] Research, Legal review recent court decisions. check on rules at ct of appeals. confer with co-counsel.	06/21/2016 14:09 - 16:15	[40115] Jose Garza		2.1
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files, confer with Gary Bledsoe and Jerry Hebert.	06/22/2016 09:43 - 10:43	[40115] Jose Garza		1.0
VID07 85B-IND-Electio	[PC] Press Contact interview with CNN.	06/27/2016 11:44 - 13:14	[40115] Jose Garza		1.5
VID07 85B-IND-Electio	[R] Research, Legal review recent sup. ct dec. for impact on standard of review here. confer with co-counsel.	06/28/2016 14:41 - 15:41	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[PC] Press Contact talk to reporter with the houston chronicle about the case and impact of recent sup. ct. dec. on same.	06/28/2016 15:42 - 16:06	[40115] Jose Garza	NC	0.4
VID07 85B-IND-Electio	[R] Research, Legal confer with Ezra R. about new sup. ct case and possible application to this case. review new Sup. Ct. case.	06/29/2016 10:14 - 12:14	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review document on topics for discussion on monday's conference call reviewed. Confer with GK on same.	07/08/2016 16:17 - 17:17	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CR] Case Review confer with Veasey counsel on strategies for appeal if necessary. review emails on possible conference call. discuss status of case with Ezra.	07/19/2016 13:46 - 15:46	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[R] Research, Legal review recently release op. from wisconsin district court on aff'd as remedy.	07/19/2016 15:47 - 16:05	[40115] Jose Garza		0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed 206 page en banc ruling from 5th cir.	07/20/2016 13:11 - 16:41	[40115] Jose Garza		3.5
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files, review time records. confer with co-counsel.	07/21/2016 14:15 - 14:39	[40115] Jose Garza	NC	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review continue to review en banc dec. confer with co-counsel regarding negotiation strategies. review email between co-counsel. review draft documents.	07/22/2016 14:30 - 16:36	[40115] Jose Garza		2.1
VID07 85B-IND-Electio	[C] Conference w/ co-counsel, review settlement documents. review emails on negotiations with state.	07/23/2016 14:32 - 16:32	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review aff'd for use in special election, review spanish language provisions confer with co-counsel	07/24/2016 12:30 - 14:18	[40115] Jose Garza		1.8

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

Code	F	Date	Time	Staff	Hours	
	i l e / I D / T y p e					
VID07 85B-IND-Electio						
	regarding same. confer with DO I on same					
VID07 85B-IND-Electio	[NEGP] Negotiations, prep	07/25/2016	11:15 - 13:15	[40115] Jose Garza	NC	2.0
	confer with Robert and Mirinda about state's response to inquiry on possible compromise. review emails on same confer with RR on same and what his position will be. review ct's order. conference call with all plaintiffs on case. review recently sent drafts of motion to expedite. review pleadings of case and case docket sheet.					
VID07 85B-IND-Electio	[CR] Case Review	07/26/2016	09:00 - 10:00	[40115] Jose Garza	NC	1.0
	review file, review motions, confer with staff, confer with counsel.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/26/2016	10:01 - 11:01	[40115] Jose Garza	NC	1.0
	reviewed motion on schedule. reviewed email on process for counting provisional ballot. reviewed article referenced by email on this. review state's response and attempt to clarify.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/27/2016	11:54 - 12:54	[40115] Jose Garza		1.0
	received and reviewed document on reasonable impediment aff'd difficulties. review email discussion on same.					
VID07 85B-IND-Electio	[R] Research, Legal	07/29/2016	13:37 - 15:37	[40115] Jose Garza		2.0
	review recent decisions on these issues. review email correspondence and respond as needed. organize file.					
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/31/2016	15:12 - 17:12	[40115] Jose Garza	NC	2.0
	recieved and reviewed agreed order drafts and comments on same. review file.					
VID07 85B-IND-Electio	[CR] Case Review	08/01/2016	10:13 - 12:13	[40115] Jose Garza	NC	2.0
	review file, review messages on new call and discussions on terms of settlement for interim plan for November. participate in conference call, suggest modification, edit proposed order and circulate.					
VID07 85B-IND-Electio	[C] Conference w/	08/02/2016	08:36 - 09:36	[40115] Jose Garza		1.0
	other P's counsel regarding status of settlement issues. review emails from state and between plaintiffs. review latest drafts of proposals on order.					

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 08/02/2016 09:37 - 11:55	[40115] Jose Garza	2.3
	review files, review 5th cir. decision on intent. review nc opinion on intent. back on conference call with other P's counsel and DOJ. End P's call and join in on call with State AG.		
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 08/02/2016 11:56 - 12:38	[40115] Jose Garza	NC 0.7
	review emails on status of discussions. Conference with State.		
VID07 85B-IND-Electio	[DOC] Document - receive/review 08/03/2016 09:00 - 12:00	[40115] Jose Garza	3.0
	continue receiving and reviewing joint order and aff'd. review modifications. participate in plaintiffs counsel conference and on jt. conference with State attys.		
VID07 85B-IND-Electio	[C] Conference w/ 08/03/2016 12:01 - 13:01	[40115] Jose Garza	NC 1.0
	with state regarding remaining issues. confer with co-counsel regarding remaining issues.		
VID07 85B-IND-Electio	[DOC] Document - receive/review 08/04/2016 06:52 - 09:52	[40115] Jose Garza	NC 3.0
	received and reviewed ezra's draft of response to State's filings. Confer with MvD. Manage file. organize. Review edits submitted by LDF. - confer with co-counsel. review new draft. and emails. coordinate response on alternative language issue.		
VID07 85B-IND-Electio	[DOC] Document - receive/review 08/05/2016 15:58 - 17:58	[40115] Jose Garza	NC 2.0
	receive and review filings by state and doj. confer with co-counsel on issues for reply. review reply		

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	document and modifications				
VID07 85B-IND-Electio	[C] Conference w/ co-counsel and counsel for DOJ, and other plaintiffs, on strategy for hearing, division of labor. discuss hearing order etc.	08/08/2016	10:34 - 11:34	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) confer with Marinda regarding outreach and education portions of hearing issues. conference in Myrna from Brennen Center. Discuss different alternatives on how to monitor state's program. prepare for moot court with Brennen Center.	08/09/2016	09:05 - 12:35	[40115] Jose Garza	NC 3.5
VID07 85B-IND-Electio	[CR] Case Review confer with Myrna on presentation. confer with Marinda on DOJ position on possible master. confer with Myrna on same.	08/09/2016	12:36 - 13:06	[40115] Jose Garza	0.5
VID07 85B-IND-Electio	[HG] Hearing court hearing, on Nov. election interim remedy.	08/10/2016	08:30 - 09:36	[40115] Jose Garza	1.1
VID07 85B-IND-Electio	[CR] Case Review review emails for logistics on afternoon calls and issues and positions of different plaintiffs. prepare for conference call and participate in call.	08/10/2016	09:37 - 10:37	[40115] Jose Garza	NC 1.0
VID07 85B-IND-Electio	[C] Conference w/ with co-counsel and with others on legal team.	08/10/2016	10:38 - 11:38	[40115] Jose Garza	NC 1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed document draft from Myrna on items for us to review on community and staff ed for nov. election.	08/10/2016	11:39 - 12:09	[40115] Jose Garza	0.5
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) review State's document production on ed and training process for Nov. election. Confer with P's counsel team on same. Participate on conference call with State on same.	08/11/2016	15:23 - 20:23	[40115] Jose Garza	NC 5.0
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) prepare for hearing with court - confer with other parties on status of negotiations on ed. and training input. confer with Marinda on same. participate in new conference with state.	08/12/2016	08:53 - 11:53	[40115] Jose Garza	NC 3.0
VID07 85B-IND-Electio	[CR] Case Review review file, review emails regarding conference call for Tuesday, on intent briefing schedule.	08/14/2016	16:23 - 16:47	[40115] Jose Garza	NC 0.4
VID07 85B-IND-Electio	[CR] Case Review review email from state on submission due tonight. respond.	08/15/2016	15:30 - 15:42	[40115] Jose Garza	0.2
VID07 85B-IND-Electio	[C] Conference w/ legal team and DOJ. discuss appeal issues from state's position. discuss under seal filings, discuss schedule for litigating intent issues. review emails.	08/16/2016	13:45 - 14:57	[40115] Jose Garza	NC 1.2
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed spanish language web page document. reviewed and commented on same. organize file. research possible appeal issues for state.	08/18/2016	13:29 - 14:29	[40115] Jose Garza	NC 1.0
VID07 85B-IND-Electio	[CR] Case Review review comments from AG regarding interim relief and threats of possible perjury prosecutions. review discussions in email concerning possible response.	08/18/2016	14:30 - 14:48	[40115] Jose Garza	0.3

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review calendar conference call schedule.	08/19/2016 09:47 - 09:53	[40115] Jose Garza	NC	0.1
VID07 85B-IND-Electio	[DOC] Document - receive/review reviewed draft of memo in support of proposed intent briefing scheduling	08/19/2016 09:54 - 10:12	[40115] Jose Garza	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review receive and review briefing schedule memo.	08/22/2016 10:28 - 10:46	[40115] Jose Garza	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed supp. memo on scheduling issues. review comments on training manuels.	08/23/2016 11:30 - 12:30	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed correspondence to state on training material. review filings by state and doj on scheduling recommendations.	08/24/2016 14:13 - 15:25	[40115] Jose Garza	NC	1.2
VID07 85B-IND-Electio	[DOC] Document - receive/review review court's scheduling order. confer with co-counsel. review email. review chart on local election offices web page references to id rules.	08/25/2016 14:12 - 14:54	[40115] Jose Garza	NC	0.7
VID07 85B-IND-Electio	[CR] Case Review confer with MvD. regarding conference call.	08/26/2016 10:45 - 10:57	[40115] Jose Garza	NC	0.2
VID07 85B-IND-Electio	[C] Conference w/ confer with co-counsel. confer with MALC regarding their position on issues dealing with sealed filings. organize file, review court's schedule, begin review of record on intent. review transcript, exhibits and court's findings and 5th cir. discussion.	08/26/2016 10:58 - 12:58	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CR] Case Review review files, review memos and letter drafts on discovery issue. review emails.	08/29/2016 17:30 - 18:54	[40115] Jose Garza	NC	1.4
VID07 85B-IND-Electio	[CR] Case Review review email on training material; review final drafts of comments and letter to AG; review DOJ comments.	08/30/2016 17:33 - 18:09	[40115] Jose Garza	NC	0.6
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed State's response to complaints about harris county elections administrator's comments. review exhibits. confer with Marinda regarding voter registration/voter id problems affecting newly registered new citizens.	09/02/2016 15:48 - 16:54	[40115] Jose Garza	NC	1.1
VID07 85B-IND-Electio	[C] Conference w/ review documents being circulated, review Tex. email, review DOJ motion. participate in counsel conference call.	09/06/2016 10:00 - 12:00	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review filings by DOJ and plaintiffs. Review court's order and email correspondence.	09/07/2016 16:18 - 16:36	[40115] Jose Garza	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review receive and review draft correspondence to the state on efforts to get message out approp suggest modifications. respond to suggestions. etc.	09/09/2016 14:31 - 14:55	[40115] Jose Garza	NC	0.4.
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files, examine for handbook training material -	09/12/2016 13:12 - 14:12	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[C] Conference w/ with other plaintiffs and doj on hearing for Friday. prepare for conference, review proposals and reply by doj.	09/16/2016 11:30 - 12:42	[40115] Jose Garza	NC	1.2

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[HGP] Hearing Prep (court) review filings, confer with co-counsel, confer with staff. prepare for hearing.	09/19/2016 10:04 - 11:34	[40115] Jose Garza	NC	1.5
VID07 85B-IND-Electio	[HG] Hearing on motion for further relief, and to enforce interim remedial order	09/19/2016 11:35 - 13:11	[40115] Jose Garza	NC	1.6
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files, review emails - review order from court. confer with co-counsel. circulate new potential issue dealing with driver's license process.	09/20/2016 09:54 - 10:42	[40115] Jose Garza	NC	0.8
VID07 85B-IND-Electio	[RCD] Received fof outline from doj, began to review and review record of the trial for suggested facts to include on intent issue.	09/20/2016 10:43 - 10:55	[40115] Jose Garza	NC	0.2
VID07 85B-IND-Electio	[R] Research, Legal review district court's initial findings of fact, review 5th cir. en banc opinion.	11/10/2016 10:55 - 12:37	[40115] Jose Garza	NC	1.7
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) review files, review emails from Ezra and others concerning nearing deadline for briefing continue review of old fof. review witness list used at trial.	11/11/2016 10:56 - 11:26	[40115] Jose Garza	NC	0.5
VID07 85B-IND-Electio	[DOC] Document - receive/review draft of intent memo. (.6) review dogget email and respond. (.1)	11/14/2016 11:04 - 11:46	[40115] Jose Garza	NC	0.7
VID07 85B-IND-Electio	[C] Conference w/ co-counsel regarding intent brief, and cert petition.	11/15/2016 10:28 - 10:58	[40115] Jose Garza	NC	0.5

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 11/16/2016 11:49 - 12:49	[40115] Jose Garza	NC	1.0	
review and organize files. Review en banc ruling on intent. review possible foia letters, confer with MvD.					
VID07 85B-IND-Electio	[DOC] Document - receive/review 11/18/2016 10:00 - 11:00	[40115] Jose Garza	NC	1.0	
receive and review new filings from parties.					
VID07 85B-IND-Electio	[M&G] Management & general 11/21/2016 09:01 - 12:01	[40115] Jose Garza	NC	3.0	
review files and organize on new fofo filed in case on Friday. Confer with staff concerning plaintiff attorney phone conference scheduled for Tuesday.					
VID07 85B-IND-Electio	[C] Conference w/ all plaintiffs atty's - discuss status of FOF and response to those filed by State, communications with DOJ, and status of response to cert. pet.	11/22/2016 15:47 - 16:47	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[DOC] Document - receive/review state's fofo, and review record on Anchia's participation on floor debate. review transcript of floor debate, etc.	11/22/2016 16:48 - 18:30	[40115] Jose Garza	NC	1.7
VID07 85B-IND-Electio	[DOC] Document - receive/review opp. to cert. review finalized and comments to Ezra.	11/23/2016 12:41 - 13:11	[40115] Jose Garza	NC	0.5
VID07 85B-IND-Electio	[DOC] Document - receive/review filing in sup. ct - opposition to cert.	11/28/2016 16:18 - 18:00	[40115] Jose Garza	NC	1.7

VID07 85B-IND-Electio	[HGP] Hearing Prep (court) 12/09/2016 13:44 - 16:44	[40115] Jose Garza	NC	3.0	
continue to review filings - DOJ, state FOFOs and briefs on matters					
VID07 85B-IND-Electio	[DOC] Document - receive/review 12/15/2016 11:25 - 12:25	[40115] Jose Garza	NC	1.0	
review draft of response to state's intent filings.					
VID07 85B-IND-Electio	[DOC] Document - receive/review 12/19/2016 10:45 - 12:45	[40115] Jose Garza	NC	2.0	
filings on intent. response briefs and response fofo from state, and response brief from DOJ.					
VID07 85B-IND-Electio	[CR] Case Review 12/28/2016 11:15 - 13:15	[40115] Jose Garza	NC	2.0	
review email from Ezra, check schedule. reply. (.2); continue to review filed briefs. (1.8)					
VID07 85B-IND-Electio	[C] Conference w/ MvD regarding oral argument conference call. (.3)	01/05/2017 17:06 - 17:24	[40115] Jose Garza	NC	0.3

VID07 85B-IND-Electio	[C] Conference w/ conference call with P group regarding hearing next week on intent issue and logistics for oral argument.	01/06/2017 10:08 - 10:56	[40115] Jose Garza	NC	0.8
conference call with P group regarding hearing next week on intent issue and logistics for oral argument.					
VID07 85B-IND-Electio	[CR] Case Review 01/13/2017 11:29 - 13:29	[40115] Jose Garza	NC	2.0	
review and organize files. review briefs and two 5th cir. opinions. check on sup. ct docket.					
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 01/18/2017 12:01 - 13:13	[40115] Jose Garza	NC	1.2	
organize files, review sup. ct web page on possible action on cert. pet. review intent briefs in prep. for					

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07

85B-IND-Electio next weeks hearing. begin work on logistics for trip. Confer with MvD re: public information request regarding voter registration.

VID07 85B-IND-Electio	[CR] Case Review	01/20/2017 15:31 - 17:43	[40115] Jose Garza	NC	2.2
	review file, confer with co-counsel regarding DOJ's motion for continuance on hearing tuesday. legal research on issue change in administration on pending litigation. review data from MvD's public information request (name match issue). Confer with Martin Golando on same. (1); prepare for and participate in hearing on motion for continuance. (1.2)				
VID07 85B-IND-Electio	[CR] Case Review	02/22/2017 15:52 - 21:22	[40115] Jose Garza	NC	5.5
	review emails from Ezra and others regarding new filing coming from State of Texas and DOJ. Review latest version of voter id law being filed with Senate. (SB 5); confer with co-counsel. Review new motion from State for continuance of Feb. 28 hearing. Review court's correspondence on same and our response.				
VID07 85B-IND-Electio	[CR] Case Review	02/23/2017 12:34 - 15:04	[40115] Jose Garza	NC	2.5
	review and organize files. coordinate with other P's counsel on effects of DOJ shift. review pleadings, motion for continuance and Joint response in opp. confer with co-counsel and discuss with other parties.				
VID07 85B-IND-Electio	[CR] Case Review	02/23/2017 15:05 - 15:53	[40115] Jose Garza	NC	0.8
	review court's order denying motion. review Ezra's note on discussions with DOJ, concerning next tuesday's hearing. confer with Emma regarding travel arrangements.				
VID07 85B-IND-Electio	[HGP] Hearing Prep (court)	02/27/2017 09:32 - 15:50	[40115] Jose Garza	NC	6.3
	review intent briefs filed by parties. and fof. (2.1); confer with co-counsel regarding process for presentation, order of presenters, emphasis. (2.2); confer with MvD. (1.1). review DOJ proposed motion. confer with others concerning a unified P position on same, etc. (3.3); finalize hearing notebook. (1.1); travel to CC. (2.5);				
VID07 85B-IND-Electio	[HGP] Hearing Prep (court)	02/28/2017 07:20 - 09:20	[40115] Jose Garza	NC	2.0
	review briefs, and fof, review US brief on intent. Confer with MvD on status of clients, and impact of changes on them. prepare presentation.				
VID07 85B-IND-Electio	[HG] Hearing	02/28/2017 09:21 - 12:21	[40115] Jose Garza	NC	3.0
	hearing before Judge Ramos on intent issue and US motion to dismiss, etc.				
VID07 85B-IND-Electio	[MTG] Meeting w/	02/28/2017 12:22 - 12:40	[40115] Jose Garza	NC	0.3
	co-counsel, debrief on hearing. confer with other parties.				
VID07 85B-IND-Electio	[TV] Travel	02/28/2017 12:41 - 15:17	[40115] Jose Garza	NC	2.6
	travel CC to SA. (2.6);				
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/01/2017 18:08 - 19:14	[40115] Jose Garza	NC	1.1
	received and reviewed transcript of hearing.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/07/2017 10:06 - 11:12	[40115] Jose Garza	NC	1.1
	received and reviewed brief on mootness issue. review emails on response to motion to dismiss. confer with co-counsel.				
VID07 85B-IND-Electio	[CR] Case Review	03/20/2017 09:00 - 11:30	[40115] Jose Garza	NC	2.5
	review brief reply on mootness issue. legal research on this issue. review memo on mootness and new legislation as well.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	04/10/2017 10:24 - 12:24	[40115] Jose Garza	NC	2.0
	received reviewed court's order. confer with co-counsel. review 5th cir. dec on remand scope.				

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[C] Conference w/ DH, MvD, and RD scope of the Court's order and effect on additional potential remedial relief.	04/11/2017 10:29 - 10:53	[40115] Jose Garza	NC	0.4
VID07 85B-IND-Electio	[CR] Case Review review file, organize file. review time records.	04/17/2017 15:51 - 16:03	[40115] Jose Garza	NC	0.2
VID07 85B-IND-Electio	[CR] Case Review review emails, confer with co-counsel on schedule for conference call.	05/02/2017 10:46 - 10:58	[40115] Jose Garza	NC	0.2
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) confer with p's counsel, discuss issues and strategies.	05/03/2017 08:59 - 09:59	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CR] Case Review review schedule to meet with clients in Willacy County. Confer with MvD on same. review SB5 language. Confer with co-counsel.	05/04/2017 11:30 - 12:00	[40115] Jose Garza		0.5
VID07 85B-IND-Electio	[TV] Travel travel to Valley for meeting with MvD and with clients.	05/08/2017 02:00 - 04:18	[40115] Jose Garza		2.3
VID07 85B-IND-Electio	[T] Telephone call to... MvD to discuss logistics for meeting with clients.	05/08/2017 04:19 - 04:31	[40115] Jose Garza		0.2
VID07 85B-IND-Electio	[HGP] Hearing Prep (court) Travel to meeting with clients and differenct locations. (2); Meet with clients, evaluate possibilities of hearing testimony if needed. Update status of case and update status of client situations. (2); Travel home. (2.3)	05/09/2017 09:33 - 15:51	[40115] Jose Garza		6.3
VID07 85B-IND-Electio	[CR] Case Review review file, review recent pleading filings. organize file. confer with co-counsel.	07/31/2017 08:50 - 10:14	[40115] Jose Garza	NC	1.4
VID07 85B-IND-Electio	[CR] Case Review review docket. confer with co-counsel.	08/01/2017 15:08 - 15:26	[40115] Jose Garza	NC	0.3
VID07 85B-IND-Electio	[DOC] Document - receive/review reviewed court's order, review notice of appeal. confer with co-counsel, prepare for conference call. Review motion to stay order. participate in conference call.	08/24/2017 12:29 - 15:29	[40115] Jose Garza	NC	3.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[R] Research, Legal Review file. research potential appeal issues. work on frame work for 3c relief.	08/27/2017 11:04 - 14:04	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[C] Conference w/ with legal team. discuss 3c relief. status of response to stay request.	08/28/2017 09:15 - 10:39	[40115] Jose Garza	NC	1.4
VID07 85B-IND-Electio	[R] Research, Legal Review proceedings on stay request. Review Ezra's draft. research question of standards for stay of district court order by 5th Cir.	08/28/2017 10:40 - 14:40	[40115] Jose Garza	NC	4.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review ezra's draft on stay request. review 5th cir. stay standard cases.	08/29/2017 13:26 - 16:26	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[DOC] Document - receive/review review new draft. confer with Gaber with Veasey on his research.	08/30/2017 13:27 - 13:51	[40115] Jose Garza	NC	0.4
VID07 85B-IND-Electio	[DOC] Document - receive/review received and reviewed brief filed on behalf of Private Plaintiffs at the 5th Cir. confer with co-counsel. review emails and comments on status.	08/31/2017 15:50 - 17:50	[40115] Jose Garza	NC	2.0
VID07 85B-IND-Electio	[CR] Case Review review files on appeal. review draft motions, and review 5th Cir. correspondence.	10/03/2017 11:04 - 11:58	[40115] Jose Garza	NC	0.9
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 10/04/2017 16:58 - 17:58 review briefs and other pleadings. update file.	[40115] Jose Garza	NC	1.0	
B-IND-Electio	[CR] Case Review review recent filings. review file and organize.	10/05/2017 11:47 - 11:59	[40115] Jose Garza	NC	0.2
VID07 85B-IND-Electio	[CR] Case Review review file. review briefing schedule. review memo from Ezra on substance of brief.	10/12/2017 13:54 - 14:30	[40115] Jose Garza	NC	0.6
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 10/18/2017 14:41 - 17:41 review files and organize. review 5th Cir. orders and correspondence.	[40115] Jose Garza	NC	3.0	
VID07 85B-IND-Electio	[CR] Case Review review files, organize and review schedule for argument and briefing. review state's brief. legal research.	10/24/2017 13:57 - 16:57	[40115] Jose Garza	NC	3.0
VID07 85B-IND-Electio	[CR] Case Review review emails on election materials, review election matters from state.	10/25/2017 14:49 - 15:49	[40115] Jose Garza	NC	1.0
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 06/07/2018 13:23 - 16:23 begin review of time records for all counsel on case in prep. for atty's fees motion.	[40115] Jose Garza	NC	3.0	
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.) 06/08/2018 12:53 - 15:47 review files, set up meetings with staff to discuss logistics for fee application. check on deadlines, review time entries for possible billing judgment exercise.	[40115] Jose Garza	NC	2.9	
VID07 85B-IND-Electio	[CR] Case Review review files, confer with Accounting to go over case expenses. Confer with brownsville staff regarding time records and record keeping.	06/12/2018 10:03 - 12:03	[40115] Jose Garza	NC	2.0

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[CR] Case Review review and organize files, review trial transcript from day 1.	06/19/2018 13:39 - 15:03	[40115] Jose Garza	1.4
VID07 85B-IND-Electio	[R] Research, Legal review notes on discussion regarding state's motion for summary judgment. begin review of prevailing party issue. pull and read district court and 5th cir. dec on fees in Davis v. Abbott.	07/11/2018 09:37 - 12:07	[40115] Jose Garza	2.5
VID07 85B-IND-Electio	[R] Research, Legal continue to review prevailing party question. read recent circuit court decisions.	07/12/2018 16:58 - 17:34	[40115] Jose Garza	0.6
VID07 85B-IND-Electio	[CR] Case Review review file, review DOJ response and our response draft. confer with Ezra.	08/08/2018 13:22 - 13:46	[40115] Jose Garza	NC
VID07 85B-IND-Electio	[CR] Case Review begin review of time records for possible fees application. confer w/ IT regarding generating fees reports.	12/13/2018 16:09 - 17:09	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[CR] Case Review review time records and edit out duplications, billing judgment exclusions, losing issues etc.	01/02/2019 14:18 - 16:18	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[EXH] Exhibit Prep review time logs, modify for potential fees application.	01/11/2019 15:48 - 16:24	[40115] Jose Garza	0.6
VID07 85B-IND-Electio	[DP] Document - prepare work on fees motion review time records, modify billable hrs on print work sheet. will begin transfer tomorrow.	01/15/2019 13:02 - 15:20	[40115] Jose Garza	2.3
VID07 85B-IND-Electio	[CR] Case Review continue to review file to prepare documents for fee application.	01/16/2019 15:13 - 16:01	[40115] Jose Garza	0.8
VID07 85B-IND-Electio	[R] Research, Legal review recent rulings on attorney's fees in southern district. review memo on fees.	01/24/2019 11:00 - 13:00	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[DP] Document - prepare work on fees declaration, review time records, confer with others on list. phone conference with other plaintiffs counsel, confer with B. Downs of the Lawyers' Committee.	01/31/2019 15:55 - 20:13	[40115] Jose Garza	4.3
VID07 85B-IND-Electio	[DP] Document - prepare work on fees motion. review templates, review time records.	02/04/2019 15:14 - 17:02	[40115] Jose Garza	1.8
VID07 85B-IND-Electio	[C] Conference w/ conference with all of P's counsel - discuss status of fees applications, need for uniformity, potential expert, etc. confer with Doggett and Dunn about possible expert.	02/05/2019 13:57 - 14:57	[40115] Jose Garza	1.0
VID07 85B-IND-Electio	[DP] Document - prepare continue work on fees motion. review time records, exercise billing judgment. confer with Robert and with Chad Dunn and with Ezra R. make calls on expert search.	02/06/2019 15:32 - 18:32	[40115] Jose Garza	3.0
VID07 85B-IND-Electio	[DP] Document - prepare work on fees documents, declaration, motion etc. also work on securing potential fees expert.	02/08/2019 10:29 - 14:29	[40115] Jose Garza	4.0
VID07 85B-IND-Electio	[DP] Document - prepare continue working on fees exhibits, communicate with Billy Edwards about expert dec. update files on fees research. send email to B. Edwards. work on declaration.	02/15/2019 09:34 - 11:34	[40115] Jose Garza	2.0
VID07 85B-IND-Electio	[DP] Document - prepare continue working on modifying time entries to account for duplication and non billable entries on Doggett time lines.	02/15/2019 11:35 - 13:23	[40115] Jose Garza	1.8

**ACTIVITY LOGS**  
**FOR CASE ID VID07, PIC=JOSE GARZA**

VID07 85B-IND-Electio	[DP] Document - prepare work on van dalen time record exhibit.	02/17/2019 13:57 - 17:15	[40115] Jose Garza	3.3
VID07 85B-IND-Electio	[DP] Document - prepare work on van dalen exhibits and on doggett exhibits. 1.2	02/19/2019 10:07 - 11:19	[40115] Jose Garza	1.2

VID07 TOTAL: 789.9

472.9nc

317hrs

**317 x \$613 = \$194,321.00**